

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

LAWRENCE WILLSON,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 4:18-cv-3-RLW
)	
CITY OF BEL-NOR, MISSOURI,)	
)	
Defendant.)	

**DEFENDANT CITY OF BEL-NOR, MISSOURI'S REQUEST FOR FINDINGS OF
FACT**

COMES NOW Defendant, City of Bel-Nor, Missouri (the “City” or “Bel-Nor”), by and through its undersigned counsel, and for its Request for Findings of Fact, ahead of the bench trial set to commence August 17, 2020, hereby requests the Court to make the following findings of fact, based upon information presented:

1. Plaintiff did continue to display his yard signs even after receiving the information in December 2017.
2. Plaintiff did not pay any fines as a result of the information he received in December 2017.
3. Plaintiff did not serve any jail time as a result of the information he received in December 2017.
4. On May 16, 2019, the Municipal Prosecutor for the City of Bel-Nor stipulated per state statute that there was no incarceration for the particular charge facing Mr. Willson.
5. Mr. Willson’s municipal case did not proceed on the merits and, instead, was repeatedly continued, by consent of all parties, while the above-captioned cause was pending.
6. The Municipal Prosecutor dismissed the municipal case against Mr. Willson on April

22, 2020.

7. Plaintiff failed to file any Rule 26(a) disclosures pertaining to the claim for Plaintiff's attorneys' fees.

BRINKER & DOYEN, L.L.P.

/s/ Jeffrey J. Brinker

Jeffrey J. Brinker, #30355
34 N. Meramec Avenue, 5th Floor
Clayton, Missouri 63105
Telephone: (314) 863-6311
Facsimile: (314) 863-8197
jbrinker@brinkerdoyen.com
Attorneys for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was filed with the Court's electronic filing system, with notice of case activity to be generated and sent electronically by the Clerk of said Court on the 28th day of July 2020, to the following:

Anthony E. Rothert
Jessie Steffan
ACLU of Missouri Foundation
906 Olive Street, Suite 1130
St. Louis, Missouri 63101
Phone: (314) 652-3114
arothert@aclu-mo.org
jsteffan@aclu-mo.org

and

Gillian R. Wilcox
ACLU of Missouri Foundation
406 W. 34th Street, Suite 420
Kansas City, Missouri 64111
Phone: (816) 470-9938
gwilcox@aclu-mo.org
Attorneys for Plaintiff

/s/ Jeffrey J. Brinker